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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Pursuant to Local Rule IA 6-1, Plaintiffs Animal Wellness Action, Cana Foundation, The Center for a Humane Economy, Laura Leigh, and Wild Horse Education, and Defendants United States Department of Interior, Bureau of Land Management (“BLM”), and Jon Raby, in his official capacity as Nevada State Director of the BLM (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and respectfully request that the Court

1 extend the time to file any motions related to attorneys' fees and costs 32 days, until
2 November 12, 2024. The Parties declare in support of this request:

3 WHEREAS, on March 28, 2024, the Court issued an opinion and order on the Parties'
4 cross-motions for summary judgment. ECF No. 81.

5 WHEREAS, on March 29, 2024, judgment was entered by the Clerk of the Court. ECF
6 No. 82.

7 WHEREAS, on April 10, 2024, the Parties filed a joint stipulation to extend the time
8 needed to explore the settlement of attorneys' fees and costs. ECF No. 83.

9 WHEREAS, on April 11, 2024, the Court granted the Parties' joint stipulation. ECF
10 No. 84.

11 WHEREAS, on June 6, 2024, the Parties filed a second joint stipulation to extend the
12 time needed to explore the settlement of attorneys' fees and costs. ECF No. 87.

13 WHEREAS, on June 6, 2024, the Court granted the Parties' second joint stipulation.
14 ECF No. 88.

15 WHEREAS, on August 1, 2024, the Parties filed a third joint stipulation to extend the
16 time needed to explore the settlement of attorneys' fees and costs. ECF No. 93.

17 WHEREAS, on August 1, 2024, the Court granted the Parties' third joint stipulation
18 and extended the deadline for Plaintiffs to file a motion for attorneys' fees until October 11,
19 2024. ECF No. 94.

20 WHEREAS, the Parties have reached an agreement in principle, and agree that an
21 additional 32 days is necessary to finalize and obtain approval for any settlement agreement.

22 WHEREAS, it is well-established that the court has the inherent power to "control the
23 disposition of the causes on its docket with economy of time and effort for itself, for counsel,
24 and for litigants." *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*,
25 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857,
26 863-64 (9th Cir. 1979).

1 NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
2 AND THE COURT ORDERS, AS FOLLOWS:

- 3 1. Upon entry of the Court's order, the deadline to file any motion for attorneys' fees
4 and costs is extended from October 11, 2024, until November 12, 2024.

5 IT IS SO STIPULATED.

6 Dated: October 8, 2024

Respectfully submitted,

7 TODD KIM
8 Assistant Attorney General
9 U.S. Department of Justice
10 Environment & Natural Resources Division
S. JAY GOVINDAN, Section Chief
11 BRIDGET K. MCNEIL, Assistant Section Chief

12 /s/ Christian H. Carrara
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25 /s/ Jessica L. Blome
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5 *Attorneys for Plaintiffs*
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7 IT IS SO ORDERED:
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9 MIRANDA M. DU
10 UNITED STATES DISTRICT JUDGE

11 DATED: _____
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2 **CERTIFICATE OF SERVICE**
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4 I hereby certify that on October 8, 2024, I electronically filed the foregoing document
5 with the Clerk of the Court for the United States District Court for the District of Nevada using
6 the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be
7 served by the appellate CM/ECF system, which includes counsel of record for all parties in the
8 case.
9

10 */s/ Christian H. Carrara*
11 CHRISTIAN H. CARRARA
12 Attorney for Federal Defendants
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